76-518

In The

Supreme Court of the United States

October Term, 1976

No.

FRANKLIN COOPER,

Petitioner,

vs.

STATE OF NEW YORK,

Respondent.

PETITION FOR A WRIT OF CERTIORARI TO THE NEW YORK SUPREME COURT, COUNTY OF NEW YORK

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No.

FRANKLIN COOPER,

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PETITION FOR A WRIT OF CERTIORARI TO THE NEW YORK SUPREME COURT, COUNTY OF NEW YORK

Petitioner, Franklin Cooper, petitions this Court for a writ of certiorari to review the order of Honorable Ernst H. Rosenberger rendered the 22nd day of March, 1976, which denied petitioner's motion to vacate his judgment of conviction for the crime of murder second degree. Petitioner served 18 years imprisonment thereon.

Mr. Justice Emilio Nunez of the Supreme Court, First Judicial Department, denied petitioner leave to appeal on the 25th day of May, 1976.

Mr. Justice Harry A. Blackmun, of this Court, granted an order on August 2, 1976, extending petitioner's time to file for a writ of certiorari until the 15th day of October, 1976.

OPINION BELOW

The opinion of Justice Rosenberger is annexed as part of the appendix.*

JURISDICTION

The jurisdiction of this Court is invoked under 28 U.S.C. §1257(3). The Supreme Court of the State of New York, Appellate Division, First Department, denied leave to appeal on the 25th day of May, 1976, and Associate Justice Harry A. Blackmun, of this Court, extended petitioner's time to file for certiorari until the 15th day of October, 1976. A copy of said orders are annexed hereto and made a part hereof.

QUESTION PRESENTED

1. Whether petitioner was adequately represented by counsel when he pleaded guilty to murder second degree before the Supreme Court of the State of New York, County of New York (Fifth, Sixth and Fourteenth Amendments, United States Constitution)?

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

The Fifth, Sixth and Fourteenth Amendments of the United States Constitution are involved herein.

ESSENTIAL FACTS

The petitioner, Franklin Cooper, pleaded guilty on September 9, 1958, to the crime of murder second degree. In 1969 he filed a previous *coram nobis* application and received a modification of sentence, *nunc pro tunc*, to a term of 20 years to life, as of the date of the original sentence. That conviction and sentence were affirmed, without opinion, by the Appellate

* The indictment number in the Supreme Court, New York County, is 4009/57.

Division of the Supreme Court of the State of New York, First Department, on November 17, 1970 (*People v. Cooper*, 35 App. Div. 2d 911).

In the instant petition, the petitioner maintains that he is innocent of the crime charged. In addition, petitioner alleges that when he was allegedly "resentenced" in 1969 because of his claim that he had been denied effective assistance of counsel upon his original sentence, that he was merely "resentenced" *nunc pro tunc* and that his plea of guilty should have been vacated rather than merely being resentenced. The plea of guilty of September 9, 1958, of murder second degree, was to an indictment charging murder first degree. This plea also covered indictments numbered 3324 and 3328 of 1957, alleging robbery first degree.

The petitioner was only 24 years of age when he pleaded guilty and had never completed his schooling. He alleged in his affidavit seeking to vacate his plea, that he had been pressured into pleading guilty and that he had made previous applications to vacate that plea and even sued out a writ of *habeas corpus*, without success.

Petitioner Cooper is not a well-educated man and is merely seeking a day in court, even though it would mean going to trial on a murder first degree charge.

When Cooper appeared before Mr. Justice Schweitzer in the Supreme Court, New York County, he said that he had told his lawyer, Peter Sabbattino, Esq., that he was innocent.

Petitioner maintained that he had never been told of his right to appeal under the provisions of *People v. Montgomery*, 24 N.Y. 2d 130.

Ironically, on the 9th of October, 1969, Mr. Justice Schweitzer instructed the clerk to vacate the sentence of October

21, 1958, which had been imposed upon petitioner's plea of guilty, and then told the clerk to "arraign" the petitioner "*de novo* on his conviction."

Later, the court said that the rearraignment should be solely for the purpose of resentence.

At page 4 of the minutes of resentence, the petitioner quite pathetically reflected the fact that he really had never had any effective assistance of counsel when he said:

> "I never see any attorney. I would like to get an attorney."

The court then said:

> "Then I will get you an attorney."

Apparently a Legal Aid attorney by the name of Edward Gasthalter was called in and, at this juncture, was told to confer with the petitioner.

The petitioner, however, was thoroughly demoralized by this time and stated that since his motion to vacate was turned down, there was really nothing else he had to say. There is no question whatsoever, however, but that the petitioner wanted to vacate his plea of guilty altogether.

REASONS FOR GRANTING THE WRIT

I.

Petitioner was deprived of adequate presentation of counsel at the time he pleaded guilty and was sentenced. His conviction should be set aside and an opportunity to withdraw his plea of guilty should be granted. Petitioner also maintains he is innocent of the crime charged (Fifth, Sixth and Fourteenth Amendments).

Petitioner herein maintains that he was never given his day in court and that he was not adequately represented by counsel. Cooper insists that he was innocent of the charges, but pleaded guilty because of inadequate representation of counsel.

The minutes of October 9, 1969 reveal that petitioner was seeking adequate assistance of counsel, but never got it.

In *Mapp v. Ohio,* 367 U.S. 643 at 659, this Court explained:

> "The criminal goes free, if he must, but it is the law that sets him free. Nothing can destroy a government more quickly than its failure to observe its own laws, or worse, its disregard of the character of its own existence."

The right to counsel is a fundamental premise of the Sixth Amendment and Fourteenth Amendment of the United States Constitution. It is submitted that that right was abridged in the case at bar. (*Johnson v. Zerbst,* 304 U.S. 458; and *Gideon v. Wainwright,* 372 U.S. 335). See also, *Mempa v. Rhay,* 389 U.S. 128, and *McConnell v. Rhay,* 393 U.S. 2.

In *Martin v. United States,* 182 F.2d 225, 20 A.L.R. 2d 1236, *cert. denied,* 340 U.S. 892, the Court aptly observed:

"The very nature of the proceeding at the time of imposition of sentence makes the presence of defendant's counsel at that time necessary if the constitutional requirement is to be met. There is then a real need for counsel. The advisability of an appeal must then, or shortly be determined. Then is the opportunity afforded for presentation to the court of facts in extenuation of the offense, or in explanation of the defendant's conduct; to correct errors or mistakes in reports of the defendant's past record; and, in short, to appeal to the equity of the court in its administration and enforcement of penal laws. Any judge with trial court experience must acknowledge that such disclosures frequently result in mitigation, or even suspension of penalty. That it is true that such discussion sometimes has a contrary result, does not detract from the fact that the nature and possibilities of this important stage of the proceedings are such as make the absence of counsel at this time presumably prejudicial."

In *Johnson v. Zerbst, supra,* this Court further emphasized the important need for counsel at all stages of a proceeding, admonishing:

"The Sixth Amendment stands as a constant admonition that if the constitutional safeguards it provides be lost, justice will not 'still be done.' It embodies a realistic recognition of the obvious truth that the average defendant does not have the professional skill to protect himself when brought before a tribunal with power to take his life or liberty, wherein the prosecution is presented by experienced and learned Counsel. That which is simple, orderly and necessary to the lawyer — to the untrained layman may appear intricate, complex and mysterious."

Under the foregoing circumstances, it is respectfully submitted that petitioner was denied a Fifth, Sixth and Fourteenth Amendment's right to the adequate assistance of counsel.

In addition, since Cooper maintains that he is innocent of the charge, under any circumstances, he should have been permitted to withdraw his plea of guilty so that he could have his day in court, which up to this time he has never had.

CONCLUSION

The petition for certiorari should be granted.

Respectfully submitted,

s/ Irving Anolik
Attorney for Petitioner

APPENDIX

CERTIFICATE DENYING LEAVE

STATE OF NEW YORK

APPELLATE DIVISION : FIRST DEPARTMENT

BEFORE: HON. EMILIO NUNEZ

Justice

The People of the State of New York,

-against-

Franklin Cooper,

Defendant.

M-1399

Indictment No.

4009/57

I, Emilio Nunez, a Justice of the Appellate Division, First Department, do hereby certify that, upon application timely made by the above-named defendant (by notice of appeal) for a certificate pursuant to Section 460.15 of the Criminal Procedure Law, and upon the record and proceedings herein, there is no question of law or fact presented which ought to be reviewed by the Appellate Division, First Department and permission to appeal from the order of the Supreme Court, New York County, entered on March 22, 1976 is hereby denied.

Certificate Denying Leave

Dated at New York, New York

May 25, 1976

s/ Emilio Nunez
Emilio Nunez, Justice

ORDER AND DECISION OF THE SUPREME COURT OF NEW YORK COUNTY

SUPREME COURT : NEW YORK COUNTY

TRIAL TERM : PART 35

THE PEOPLE OF THE STATE OF NEW YORK

-against-

FRANKLIN COOPER,

Defendant.

Indictment No. 4009/57

ERNST H. ROSENBERGER, J.:

Petitioner, Franklin Cooper, now at liberty on a life parole after serving almost eighteen years in prison, seeks by way of writ of error coram nobis to vacate a guilty plea taken on September 9, 1958. He maintains his innocence of the crime charged.

In 1969, on a previous coram nobis application based on his claim that he was not advised of his right to appeal, petitioner was re-sentenced to a term of 20 years to life, nunc pro tunc, as of the date of his original sentence. The conviction and sentence

Order and Decision of the Supreme Court of New York County

were affirmed without opinion by the Appellate Division, First Department, on November 17, 1970 (35 AD 2d 911).

The first ground for petitioner's present application is an allegation that he was innocent of the crime allegedly committed on December 18, 1959, and that he was coerced by counsel to plead guilty.

The second ground alleged by petitioner is that his guilty plea was not vacated as a result of a "Montgomery" hearing in 1969, but that he was merely re-sentenced nunc pro tunc by Justice Mitchell Schweitzer.

Considering the second ground first, this court rejects the contention that defendant was entitled to more than resentencing in 1969. The only relief granted in People v. Montgomery, 24 NY 2d at page 134, by the Court of Appeals is as follows: "If his allegations prove to be meritorious, he should be resentenced so that his time to appeal will run anew."

Thus the full Montgomery sanction was invoked by Justice Schweitzer. Defendant was not entitled to have his conviction set aside because of failure to advise him of the right to appeal (People v. Curkendall, 36 AD 2d 979 [Third Dept. 1971]).

Defendant's main contention that he is innocent and that he now wants a trial so that his innocence can be shown is not a ground, without more, for a motion to vacate a judgment under section 440.10 of the Criminal Procedure Law.

The original plea and sentencing minutes indicate that in response to questioning by the court defendant stated that he was voluntarily pleading guilty. He was represented by counsel. He offers nothing except his bare eighteen-year-old allegation that the plea was not voluntarily taken. Without more evidence of that fact the conviction should not be set aside (People v.

Order and Decision of the Supreme Court of New York County

Moore, 36 AD 2d 869 [Third Dept. 1971]). Nor should a hearing be granted where petitioner does not show facts sufficient to warrant a hearing (see, for example, People v. Weeden, 38 AD 2d 637 [Third Dept. 1971]).

Lastly, since petitioner's motion comes eighteen years after his conviction, the possibility of litigating the original charge is almost nonexistent. The promptness or staleness of a complaint with respect to a guilty plea is a significant factor to be considered in deciding whether to set it aside (People v. Nixon, 21 NY 2d 338).

In view of all the foregoing reasons, the motion is denied.

Dated: February 22, 1976

So Ordered:

Ernst H. Rosenberger
J.

ORDER EXTENDING TIME TO FILE PETITION FOR WRIT OF CERTIORARI

SUPREME COURT OF THE UNITED STATES

No. A-78

FRANKLIN COOPER,

Petitioner

V.

NEW YORK

Order Extending Time to File Petition for Writ of Certiorari

UPON CONSIDERATION of the application of counsel for petitioner,

IT IS ORDERED that the time for filing a petition for writ of certiorari in the above-entitled cause be, and the same is hereby, extended to and including October 15, 1976.

s/ Harry A. Blackmun
Associate Justice of the Supreme Court of the United States

Dated this 2nd day
of August, 1976.

IN THE

Supreme Court of the United States

October Term, 1976

No. A-78 **76-518**

FRANKLIN COOPER,

Petitioner,

against

THE PEOPLE OF THE STATE OF NEW YORK,

Respondent.

BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

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IN THE

Supreme Court of the United States

October Term, 1976

No. A-78

FRANKLIN COOPER,

Petitioner,

against

THE PEOPLE OF THE STATE OF NEW YORK,

Respondent.

BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

Preliminary Statement

Franklin Cooper seeks a writ of certiorari to review a decision and order of the Supreme Court, New York County (ROSENBERGER, J.), entered February 22, 1976. By this order, the court denied Cooper's motion to vacate his guilty plea to MURDER IN THE SECOND DEGREE. The New York State Appellate Division, First Department (NUNEZ, J.), refused permission to appeal from that order on May 25, 1976. Cooper did not seek leave to appeal from the Appellate Division order to the Court of Appeals. *See,* N.Y.C.P.L. §450.90.

Introduction

By an indictment filed December 18, 1957, Franklin Cooper, Clifford Hanson and Leroy Jones were charged with murder in the first degree. Indictment No. 4009-57. All three defendants entered pleas of not guilty on January 10, 1958.

Cooper went to trial on May 13, 1958. He was represented by three attorneys assigned by the court (Alfred Norick, George Todaro and Gilbert Rosenthal) and by Peter Sabbatino, a lawyer retained by the defendant's family (T: 4-6).* At Cooper's request, Sabbatino tried the case (T: 7). The court declared a mistrial on May 19, 1958, after defendant's motion, on the ground that the People had introduced evidence concerning Cooper's intent to commit a crime unrelated to the one charged in the indictment (T: 170-178).

On September 9, 1958, Cooper appeared before the Court of General Sessions, New York County (SCHWEITZER, J.). He was represented by four attorneys—Sabbatino, Norick, Todaro and Harold Frankel. Cooper withdrew his plea of not guilty to murder in the first degree and entered a plea of guilty to murder in the second degree to cover Indictment Number 4009-57. At that time, Cooper also entered a plea of guilty to robbery in the first degree to cover another charge pending against him at the time. Indictment No. 3324, 3328/57.

* Parenthetical references preceded by "T" refer to the minutes of trial; references preceded by "P" refer to minutes of the 1958 plea conference; references preceded by "H" refer to the 1969 *coram nobis* hearing.

The court asked the defendant if he wished to plead guilty to the crimes of murder in the second degree and robbery in the first degree. Cooper indicated that he wished to plead guilty (P: 3). The court then inquired into the factual basis of the murder charge. Cooper acknowledged that he shot and killed Edward Dudley with a pistol during the commission of a felony (P: 3). After calling Cooper's attention to a bench conference with respect to the scope of sentence, the court asked Cooper if anyone had made him any promise which had induced him to plead guilty. Cooper indicated that no such promise had been made and that he was entering his plea willingly and voluntarily (P: 3-4).

Cooper was sentenced to a term of 20 years to life on October 21, 1958. Cooper did not appeal from this conviction and sentence.

Defendant's Post Conviction Motions

The 1969 *coram nobis* application

On August 19, 1969, Cooper moved *pro se* for a writ of error *coram nobis*. He argued that his conviction should have been set aside because he was not advised of his right to appeal from the judgment of conviction in 1958. Justice SCHWEITZER concluded that Cooper had not been told of his right to appeal at the time of his sentence on October 21, 1958. The court followed the applicable state procedure by directing that Cooper be arraigned for resentencing (H: 2-3). Where a defendant has been denied an appeal because he was unaware of his right to do so, a resentencing allows "the time to appeal [to] run anew,"

People v. *Montgomery,* 24 N.Y.2d 130, 134 (1969), and thereby affords a defendant a chance to perfect an appeal long after the time to do so has expired. *People* v. *O'Bryan,* 26 N.Y.2d 95, 96 (1970); *People* v. *Calloway,* 24 N.Y.2d 127, 129 (1969).

The court inquired whether Cooper had any cause to show why judgment should not be pronounced against him (H: 3). Speaking on his own behalf, Cooper stated that the proceedings were in violation of his rights under section 237 of the Code of Criminal Procedure (H: 4).* The court denied Cooper's application, holding that the lapse of time since the 1958 proceedings was inherently prejudicial to the People.

Thereafter, the petitioner was given an opportunity to state further objections. After replying that he had no more exceptions, Cooper expressed the desire to speak to an attorney (H: 4).** Cooper conferred with an attorney, Edward Gasthalter. When the case was recalled, Cooper was given an opportunity to state his objections to resentencing. He replied that he had only the motion which was denied (H: 5-6). Cooper was then resentenced to a minimum of twenty years and a maximum of life, *nunc pro tunc* as of the date of his original sentence, and advised of his right to appeal (H: 6-7). This was the same sentence Cooper received in 1958.

* Section 237 mandated the court's appointment of a foreman for the grand jury. Section 337 set forth the guidelines for the withdrawal of a guilty plea before the imposition of sentence. Neither section of the Code authorized any form of post conviction relief.

** Petitioner suggests that this desire for an attorney in 1969 reflected the state of affairs at the time of the plea and sentence in 1958. See Petitioner's Brief, 4. Taken in the context of the *coram nobis* hearing, the statement is merely indicative of Cooper's desire to consult with a lawyer for the purpose of that hearing.

On appeal Cooper contended that the case should have been remanded so that he might have elaborated upon his reasons why judgment should not have been imposed and been resentenced anew. The Appellate Division of the Supreme Court, First Department, affirmed the conviction and resentence on November 17, 1970. *People* v. *Cooper,* 35 A.D.2d 911.

At no time did Cooper take advantage of the resentencing to file an appeal of his original judgment of conviction.

The 1976 *coram nobis* application

In 1976, before the Supreme Court, New York County, Cooper sought once again to vacate his 1958 guilty plea by way of writ of error *coram nobis.* He alleged that he was innocent of the murder with which he was initially charged and that he was coerced by counsel to plead guilty. Cooper also alleged that his guilty plea should have been vacated after the 1969 hearing. Justice Ernst Rosenberger denied the motion by a decision filed February 22, 1976.

As to the 1969 hearing, the court ruled that Cooper had received the full benefit of the relief provided for by *People* v. *Montgomery, supra.* Addressing the petitioner's claim of innocence, the court pointed out that such a bare allegation, with nothing more, is not a ground for a motion to vacate a judgment under Criminal Procedure Law Section 440.10. The court also considered Cooper's naked contention that he did not voluntarily plead guilty and found that the minutes of the 1958 plea established that the plea was offered willingly and voluntarily. Accordingly, Cooper's petition was dismissed without a hearing.

Justice NUNEZ, of the Appellate Division, First Department, denied permission to appeal from the order of the Supreme Court on May 25, 1976.

Cooper asks this Court to grant a writ of certiorari to review Justice ROSENBERGER's February 22, 1976 order which denied petitioner's motion to vacate his judgment of conviction based on his 1958 guilty plea. He argues that since he was deprived of adequate assistance of counsel at the time of his guilty plea and sentence, his conviction should have been set aside.

Although he has served his sentence for the 1958 conviction, Cooper is now incarcerated on an unrelated matter.

POINT I

Cooper has failed to show that this Court has jurisdiction to review the state court decision, and his petition should be denied.

One who petitions this Court to review the judgment of a state court must establish that the Court has jurisdiction to do so. *Durley* v. *Mayo,* 351 U.S. 277, 281-82 (1956); *Stembridge* v. *Georgia,* 343 U.S. 541, 547 (1952). Cooper states that he seeks to invoke the jurisdiction vested in this Court by 28 U.S.C. §1257(3) (62 Stat. 929). Petition at 2. Under this provision, Cooper is required to demonstrate that the federal question which he asks this Court to review "was presented to the highest court of the State having jurisdiction." *Klinger* v. *Missouri,* 13 Wall. 257, 263 (1871), cited in *Durley* v. *Mayo, supra.* As a second prerequisite to establishing this Court's jurisdiction, Cooper must demonstrate that the state court decision to be scrutinized rested upon federal grounds. *See, e.g., Durley* v. *Mayo, supra;* Supreme Court Rules, Rule 23 (1) (f), 398 U.S. 1035.

Cooper has not, and cannot, satisfy either of these requirements. The question presented in Cooper's petition was not at issue before the Supreme Court, New York County. Nor is there any indication that the state courts, in fact, considered the federal claim Cooper now asserts in his petition.

In his 1976 *coram nobis* application, Cooper argued that he was innocent of the murder charged in the 1957 indictment and that he was coerced by counsel to plead guilty. Cooper asserts in his petition to this Court only that he was inadequately represented by counsel at the time of his plea and sentence in 1958. Cooper's contention before the state court went to the voluntariness of his plea. *See, e.g., Brady* v. *United States,* 397 U.S. 743, 748 (1969). At no time in the New York courts did Cooper frontally attack the competence of his lawyers' overall performance. Consequently, the New York courts have never passed on the federal question Cooper now raises in his petition. It is well established that this Court "will not decide federal constitutional issues raised * * * for the first time on review of state court decisions." *Cardinale* v. *Louisiana,* 394 U.S. 437, 438 (1969); *Monks* v. *New Jersey,* 398 U.S. 71 (1970); *Hill* v. *California,* 401 U.S. 797, 805 (1971); *Tacon* v. *Arizona,* 410 U.S. 351, 352 (1973).

Moreover, the court below denied Cooper's application without reaching any federal constitutional issue. Reference to Justice ROSENBERGER's decision establishes that peti-

tioner's motion was denied without a hearing because his moving papers failed to "allege any ground constituting legal basis for the motion." N.Y.C.P.L. §440.30 (4)(a). To prevail in an application for a writ of error *coram nobis,* the petitioner must inform the court of those facts which, as a matter of law, would undermine the court's basis for its judgment of conviction. *People* v. *Kass,* 33 A.D. 2d 515 (1st Dept. 1969); *see, People* v. *Crimmins,* 38 N.Y. 2d 407, 418 (1975). In the proceedings below, Cooper's allegations of innocence and a coerced plea were both conclusory, totally lacking in factual evidence to support them. *See, People* v. *Wilder,* 25 A.D. 2d 889 (2nd Dept. 1966). Since the minutes of the court proceedings conclusively refuted Cooper's unsupported assertions, under state law the court properly dismissed the application without a hearing. *People* v. *Lufland,* 21 N.Y. 2d 746 (1968); *People* v. *Robinson,* 38 A.D. 2d 821 (1st Dept. 1972); *People* v. *Rodriguez,* 31 A.D. 2d 753 (2nd Dept. 1969).

Consequently, Cooper's application was denied because of his failure to comply with New York procedural requirements. Cooper's *coram nobis* petition failed to set forth facts which, if true, would have entitled him to relief. Thus, the court never reached the federal question which is raised by Cooper's petition. Where a state court judgment rests on "independent and adequate state grounds," it is well established that this Court will not review it. *Henry* v. *Mississippi,* 379 U.S. 443, 446 (1965); *Durley* v. *Mayo,* 351 U.S. at 281.

Cooper has failed to establish that the federal question which he asks this Court to review was presented to the New York court. Nor has he shown that the New York Supreme Court actually decided *any* federal question, much less the one he now raises in his petition.

POINT II

Cooper's contention does not present a substantial federal question.

An examination of the merits of Cooper's unsupported allegation reveals that he has presented no substantial question to this Court for review. At his trial, petitioner was represented by four attorneys. One of those lawyers, Peter Sabbatino, was retained by the defendant's relatives. At Cooper's request, Sabbatino had primary responsibility for handling the trial. The trial ended after Sabbatino's motion for a mistrial was granted.

At his plea conference several months after the mistrial, Cooper was represented by four attorneys, including Sabbatino. As a result of his plea, Cooper faced a lesser sentence on the murder charge. Moreover, he had the advantage of serving concurrent time on a pending, unrelated robbery indictment. Pleading guilty was clearly in Cooper's best interest. *See, Brady* v. *United States,* 397 U.S. at 749.

Cooper admitted in open court that he committed the acts charged in the indictment. There were no allegations of threats or off-the-record promises. Cooper indicated that his plea was voluntary, a product of his own free will.

On the face of the record, Cooper's attorneys spent a great amount of time in securing a final disposition which was in the best interests of their client. In any event, there is no indication that the quality of Cooper's legal assistance approached that level of incompetence which would comprise a violation of petitioner's Sixth Amendment right to assistance of counsel.

Conclusion

The petition should be denied.

Respectfully submitted,

ROBERT M. MORGENTHAU
District Attorney
New York County

ROBERT M. PITLER
Assistant District Attorney

ROBERT M. GROSS
Criminal Law Investigator

Of Counsel

December, 1976